

ATTACHMENT “A”

COMPLAINT ALLEGATIONS GRID

General & Conclusory Allegations

<p><i>Ashton</i></p> <p>¶ 595: The practice and policy of DALLAH ALBARAKA GROUP LLC and AL BARAKA BANK is to provide financial support and material assistance to international terrorist organization including AL QAEDA.</p>	<p><i>Burnett</i></p> <p>¶ 59: The practice and policy of Dallah Albaraka Group LLC and al Baraka Bank is to provide financial support and material assistance to international terrorist organizations including al Qaeda.</p>
<p><i>O'Neill</i></p> <p>¶ 22: Defendants Al Baraka Investment and Development Corporation a/k/a Al Baraka Bank a/k/a Dallah Albaraka Group LLC... have conspired with Osama Bin Laden and al Qaeda to raise, launder, transfer, distribute and hide funds for Osama bin Laden and al Qaeda in order to support and finance... the September 11th attacks.</p> <p>¶ 23: Defendant[] Saleh Abdullah Kamel... [has]conspired with Osama bin Laden and al Qaeda to raise, launder, transfer, distribute and hind funds for Osama bin Laden and al Qaeda in order to support and finance.. the September 11th attacks or otherwise assisted them in their terrorist activities.</p>	<p><i>Euro Brokers</i></p> <p>¶ 91: Defendants Dallah Albaraka Group LLC, Al Baraka Investment and Development Corporation, Al Baraka Bancord, Inc., and AL Baraka, lent repeated material support to Al Qaeda and OBL, aided and abetted others who lent material support to Al Qaeda, and otherwise engaged in racketeering activity in violation of the law.</p> <p>See also: ¶¶ 85, 89, 121</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 99: Defendant Dallah Albaraka holds itself out as a legitimate international banking and financial enterprise. Yet, Dallah Albaraka has knowingly and intentionally lent material support to Al Qaeda through, <i>inter alia</i>, the use of interstate and international faxes, telephones, wire transfers and transmissions, and mailings.</p> <p>See also: ¶¶ 103, 105, 135.</p>	<p><i>Continental Casualty</i></p> <p>¶ 486: The practice and policy of Dallah Albaraka Group LLC and AL BARAKA Bank is to provide financial support and material assistance to international terrorist organizations including AL QAEDA.</p>
<p><i>NY MAGIC:</i></p> <p>¶ 45: Defendants, . . .Saleh Abdullah Kamel; Al Baraka Investment and Development; Saudi Dallah Al Baraka Group LLC . . . have aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTO's, associations, organizations or persons.</p> <p>¶465: Saleh Abdullah Kamel is . . .one of al Qaeda's principal individual financiers.</p> <p>See also ¶ 284</p>	<p><i>WTC Properties</i></p> <p>¶ 107: The practice and policy of Dallah Albaraka Group LLC and al Baraka Bank is to provide financial support and material assistance to international terrorist organizations including al Qaeda.</p>

Al Baraka General Operations

<p><i>Ashton</i></p> <p>¶ 583: AL BARAKA INVESTMENT & DEVELOPMENT CORPORATION (or “AL BARAKA”), a wholly owned subsidiary of DALLAH ALBARAKA GROUP LLC (or “DALLAH ALBARAKA”), is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as “al Baraka Bank.” United States assets include AL BARAKA Bancorp Inc. in Chicago, Illinois, and AL BARAKA Bancorp Inc. in Houston, Texas.</p> <p>¶ 593: DALLAH ALBARAKA GROUP LLC’s financial arm is AL BARAKA Investment & Development (or “ABID”), a wholly owned subsidiary based in Jeddah, Saudi Arabia.</p>	<p><i>Burnett</i></p> <p>¶ 47: Al Baraka Investment & Development Corporation (or “al Baraka”), a wholly owned subsidiary of Dallah Albaraka Group LLC (or “Dallah Albaraka”), is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as “al Baraka Bank.” United States assets include al Baraka Bancorp Inc. in Chicago, Illinois, and al Baraka Bancorp Inc. in Houston, Texas.</p> <p>¶ 57: Dallah Albaraka Group LLC’s financial arm is al Baraka Investment & Development (or “ABID”), a wholly owned subsidiary based in Jeddah, Saudi Arabia.</p>
<p><i>O’Neill</i></p> <p>¶ 28: Defendant Al Baraka Investment and Development Corporation (or “al Baraka”) a wholly owned subsidiary of Dallah Albaraka Group LLC, is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as “al Baraka Bank.” United States assets include al Baraka Bancorp Inc[s]. in Chicago, Illinois and.. Houston Texas.</p> <p>¶ 29: Dallah Albarak Group LLC (or “Dallah Albaraka”), a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. This includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.</p>	<p><i>Euro Brokers</i></p> <p>¶ 87: ...Defendant Al Baraka Investment & Development Corporation (“ABID Corp”) is the wholly owned subsidiary of defendant Dallah Albarka. ABID Corp. exercised control and direction over several of its foreign subsidiaries including banks and financial institutions registered as “Al Baraka Bank.”</p> <p>¶ 88: Defendant ABID Corp. also controls the assets of two United States entities... Defendant Al Baraka Investment & Development (ABID) is a sister entity of ABID Corp. In addition to being a wholly-owned subsidiary of Dallah Albaraka, ABID also functions as Dallah Albaraka’s financial arms. Defendants Dallah Albaraka, ABID Corp. and ABID are collectively referred to herein as “Al Baraka.”</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 101: ...Defendant Al Baraka Investment & Development Corporation (“ABID Corp”) is the wholly owned subsidiary of defendant Dallah Albarka. ABID Corp. exercised control and direction over several of its foreign subsidiaries including banks and financial institutions registered as “Al Baraka Bank.”</p> <p>¶ 102: Defendant ABID Corp. also controls the assets of two United States entities... Defendant Al Baraka Investment & Development (ABID) is a sister entity of ABID Corp. In addition to being a wholly-owned subsidiary of Dallah Albaraka, ABID also functions as Dallah Albaraka’s financial arms. Defendants Dallah Albaraka, ABID Corp. and ABID are collectively referred to herein as “Al Baraka.”</p>	<p><i>Continental Casualty</i></p> <p>¶ 474: AL BARAKA INVESTMENT & DEVELOPMENT CORPORATION (or "AL BARAKA"), a wholly owned subsidiary of DALLAH ALBARAKA GROUP LLC (or "DALLAH ALBARAKA"), is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as "al Baraka Bank." United States assets include AL BARAKA Bancorp Inc. in Chicago, Illinois, and AL BARAKA Bancorp Inc. in Houston, Texas.</p> <p>¶ 484: Dallah Albaraka Group LLC’s financial arm is al Baraka Investment & Development (or “ABID”), a wholly owned subsidiary based in Jeddah, Saudi Arabia. See also: ¶ 479</p>
<p><i>NY MAGIC:</i></p> <p>¶ 277: Al Baraka Investment and Development Compant (“Al Baraka”) is a wholly owned subsidiary of Saudi Dallah al Baraka Group, LLC. Al Baraka is headed by defendant Saleh Abdullah Kamel.</p>	<p><i>WTC Properties</i></p> <p>¶ 95: Al Baraka Investment & Development Corporation (or “Al Baraka), a wholly owned subsidiary of Dallah Albaraka Group LLC (or “Dallah Albaraka”), is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as “Al Baraka Bank.” United States assets include Baraka Bancorp Inc. in Chicago, Illinois, and al Baraka Bancorp Inc. in Houston, Texas.</p> <p>¶ 105: Dallah Albaraka Group LLC’s financial arm is al Baraka Investment & Development (or “ABID”), a wholly owned subsidiary based in Jeddah, Saudi Arabia.</p>

Dallah al Baraka Group General Operations

<p><i>Ashton</i></p> <p>¶ 588: DALLAH ALBARAKA GROUP LLC, a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. The group includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.</p>	<p><i>Burnett</i></p> <p>¶ 52: Dallah Albaraka Group LLC, a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. The group includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.</p>
<p><i>O'Neill</i></p> <p>¶ 29: Dallah Albarak Group LLC (or "Dallah Albaraka"), a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. This includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.</p>	<p><i>Euro Brokers</i></p> <p>¶ 84: Defendant Dallah Albaraka Group LLC a.k.a. Al Baraka Bank ("Dallah Albaraka") is a financial conglomerate based in Jeddah, Saudi Arabia. Within the Dallah Albaraka financial umbrella are over twenty banks and investment groups, including defendant Al Baraka Investment & Development Corp.</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 98: Defendant Dallah Albaraka Group LLC a.k.a. Al Baraka Bank ("Dallah Albaraka") is a financial conglomerate based in Jeddah, Saudi Arabia. Within the Dallah Albaraka financial umbrella are over twenty banks and investment groups, including defendant Al Baraka Investment and Development Corporation.</p>	<p><i>Continental Casualty</i></p> <p>¶ 479: Dallah Albaraka Group LLC, a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. The group includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.</p>
<p><i>NewYork MAGIC</i></p> <p>¶ 277: Al Baraka Investment and Development Company ("Al Baraka") is a wholly owned subsidiary of Dallah al Baraka Group, LLC. Al Baraka is headed by defendant Saleh Kamel.</p> <p>¶ 286: ...Saudi Arabia channeled massive financial support ... through a complex banking system that had at its centers two entities: Dar-Al Maal Al Islami Trust ...and Saudi Dallah Al-Baraka Foep LLC. (TODD – I am not sure where this allegation should go???)</p>	<p><i>WTC Properties</i></p> <p>¶ 100: Dallah Albaraka Group LLC, a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. The group includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.</p>

Biographical Information on Saleh Abdullah Kamel

<p><i>Ashton</i></p> <p>¶ 587: Defendant SALEH ABDULLAH KAMEL was born in Makkah, Saudi Arabia, in 1941. After being the adviser to the Saudi Minister of Finance, in 1969 he founded DALLAH ALBARAKA GROUP LLC, quickly establishing himself as one of the leading promoters of an Islamic financial and banking system capable of rivaling large Western institutions.</p>	<p><i>Burnett</i></p> <p>¶ 51: Defendant Saleh Abdullah Kamel was born in Makkah, Saudi Arabia, in 1941. After being the adviser to the Saudi Minister of Finance, in 1969 he founded Dallah Albaraka Group LLC, quickly establishing himself as one of the leading promoters of an Islamic financial and banking system capable of rivaling large Western institutions.</p>
<p><i>O'Neill</i></p> <p>¶ 23: Defendant[] Saleh Abdualлах Kamel . . .[is a] businessman[], banker[], financier[], . . .</p>	<p><i>Euro Brokers</i></p> <p>¶ 87: . . .Kamel is a Saudi national and is a wealthy financier and businessman . . .</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 101: . . .Kamel is a Saudi national and is a wealthy financier and businessman . . .</p>	<p><i>Continental Casualty</i></p> <p>¶ 478: Defendant SALEH ABDULLAH KAMEL was born in Makkah, Saudi Arabia, in 1941. After being the adviser to the Saudi Minister of Finance, in 1969 he founded Dallah Albaraka Group LLC, quickly establishing himself as one of the leading promoters of an Islamic financial and banking system capable of rivaling large Western institutions.</p>
<p><i>NY MAGIC</i></p> <p>¶ 465: Saleh Abdullah Kamel is a wealthy businessman . . .</p>	<p><i>WTC Properties</i></p> <p>¶ 99: Defendant Saleh Abdullah Kamel was born in Makkah, Saudi Arabia, in 1941. After being the adviser to the Saudi Minister of Finance, in 1969 he founded Dallah Albaraka Group LLC, quickly establishing himself as one of the leading promoters of an Islamic financial and banking system capable of rivaling large Western institutions.</p>

Ownership Interest in Al Shamal Islamic Bank

<p><i>Ashton</i></p> <p>¶ 594: SALEH ABDULLAH KAMEL, Chairman of DALLAH AL BARAKA and AL BARAKA Bank, was one of the three founding members of AL SHAMAL ISLAMIC BANK. SALAH ABDULLAH KAMEL [co-]founded the bank in 1983...</p> <p>See also ¶¶ 52-53</p>	<p><i>Burnett</i></p> <p>¶ 58: Saleh Abdullah Kamel, Chairman of Dallah al Baraka and al Baraka Bank, was one of the three founding members of Al Shamal Islamic Bank. Saleh Abdullah Kamel [co-]founded the bank in 1983...</p> <p>See also: ¶¶ 72-73</p>
<p><i>O'Neill</i></p> <p>¶ 48: In April 1984, al Shamal Islamic Bank issued shares to major shareholders, among others, Defendant al Baraka Investment and Development Corporation . . .</p> <p>See also: ¶¶ 31, 46</p>	<p><i>Euro Brokers</i></p> <p>¶ 108: Defendant Al Shamal Bank is based in Sudan. It was [co-]founded by defendant Saleh Abdullah Kamel (who as noted founded defendant Dallah Albaraka)...</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 122: Defendant Al Shamal Bank is based in Sudan. It was [co-]founded by.. defendant Saleh Abdullah Kamel (who as noted founded defendant Dallah Albaraka)...</p>	<p><i>Continental Casualty</i></p> <p>¶ 485: SALEH ABDULLAH KAMEL, Chairman of DALLAH AL BARAKA and AL BARAKA Bank, was one of the three founding members of AL SHAMAL ISLAMIC BANK. SALAH ABDULLAH KAMEL [co-]founded the bank in 1983...</p> <p>See also: ¶¶ 52, 53</p>
<p><i>NY MAGIC:</i></p> <p>¶ 301: ... Shareholders of Al Shamal Bank include defendant Saleh Abdullah Kamel, al Baraka Investment and Development...</p> <p>¶ 465: ... [Saleh Abdullah] Kamel is a shareholder in Al Shamal Bank . . .</p> <p>See also: ¶ 283</p>	<p><i>WTC Properties</i></p> <p>¶ 106: Saleh Abdullah Kamel, Chairman of Dallah al Baraka and al Baraka Bank, was one of the three founding members of Al Shamal Islamic Bank. Saleh Abdullah Kamel [co-]founded the bank in 1983...</p> <p>See also: ¶¶ 119, 120, 1101,1105, 1114</p>

Sudanese Banking Assets

<p><i>Ashton</i></p> <p>¶ 69: Shareholders of the TADAMON ISLAMIC BANK include AL BARAKA INVESTMENT AND DEVELOPMENT CORPORATION (and/or subsidiaries of the DALLAH AL BARAKA GROUP) SALEH ABDULLAH KAMEL ...</p> <p>¶ 586: AL BARAKA INVESTMENT & DEVELOPMENT is present in the Sudanese banking sector, through assets held in Algharb Islamic Bank, AL SHAMAL ISLAMIC BANK, FAISAL ISLAMIC BANK, SUDANESE ISLAMIC BANK and TADAMON ISLAMIC BANK. AL BARAKA is also affiliated with the National Development Bank in SUDAN.</p> <p>¶ 585: AL BARAKA provided OSAMA BIN LADEN with financial infrastructures in SUDAN beginning in 1983.</p>	<p><i>Burnett</i></p> <p>¶ 108: Shareholders of the Tadamon Islamic Bank include Al Baraka Investment and Development Corporation (and/or subsidiaries of the Saudi Dallah al Baraka Group) Saleh Abdullah Kamel ...</p> <p>¶ 50: Al Baraka Investment & Development is mostly present in the Sudanese banking sector, through assets held in Algharb Islamic Bank, Al Shamal Islamic Bank, Faisal Islamic Bank, Sudanese Islamic Bank and Tadamon Islamic Bank. Al Baraka is also affiliated with the National Development Bank in Sudan.</p> <p>¶ 49: Al Baraka provided Osama Bin Laden with financial infrastructures in Sudan beginning in 1983.</p>
<p><i>O'Neill</i></p> <p>¶ 31: The al Baraka Bank provided Osama bin Laden with financial infrastructures in the Sudan beginning in 1983.</p>	<p><i>Euro Brokers</i></p> <p>¶ 112: Tadamon's current and former major shareholders are themselves banking and financial institution defendants: Saleh Abdulla Kamel, Al Baraka (and/or subsidiaries of Dallah al Baraka)...</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 126: Defendant Tadamon Bank is also a major shareholder of Al Shamal Bank. Tadamon's current and former major shareholders are themselves banking and financial institution defendants: Saleh Abdullah Kamel, Al Baraka (and/or subsidiaries of Dallah al Baraka), and Faisal Islamic Bank (Sudan).</p>	<p><i>Continental Casualty</i></p> <p>¶ 69: Shareholders of the TADAMON ISLAMIC BANK include AL BARAKA INVESTMENT AND DEVELOPMENT CORPORATION (and/or subsidiaries of the SAUDI DALLAH AL BARAKA GROUP) SALEH ABDULLAH KAMEL...</p> <p>¶ 477: AL BARAKA INVESTMENT & DEVELOPMENT is mostly present in the Sudanese banking sector, through assets held in Algharb Islamic Bank, AL SHAMAL ISLAMIC BANK, FAISAL ISLAMIC BANK, SUDANESE ISLAMIC BANK and TADAMON ISLAMIC BANK. AL BARAKA is also affiliated with the National Development Bank in SUDAN.</p>
<p><i>NY MAGIC</i></p> <p>¶ 314: The shareholders of Tadamon Islamic Bank include al Baraka Investment and Development Corporation, Saleh Abdullah Kamel, National Development Bank and Trade, Dubai Islamic Bank and Faisal Islamic Bank.</p> <p>¶ 465: [Saleh Abdullah] Kamel is a shareholder in ...Tadamon Islamic Bank...</p>	<p><i>WTC Properties</i></p> <p>¶ 98: Al Baraka Investment & Development is mostly present in the Sudanese banking sector, through assets held in Algharb Islamic Bank, Al Shamal Islamic Bank, Faisal Islamic Bank, Sudanese Islamic Bank and Tadamon Islamic Bank. Al Baraka is also affiliated with the National Development Bank in Sudan.</p>

Ownership Interest in Al Aqsa Islamic Bank

<p><i>Ashton</i></p> <p>¶ 596: In 1998, AL AQSA ISLAMIC BANK was established with \$20 million in capital. The main shareholders were DALLAH AL BARAKA GROUP LLC and the Jordan Islamic Bank. Jordan Islamic Bank, a DALLAH AL-BARAKA LLC subsidiary owns 14 percent of AL-AQSA ISLAMIC BANK. SALEH ABDULLAH KAMEL acknowledged that DALLAH AL-BARAKA Group LLC owns another twelve percent directly.</p>	<p><i>Burnett</i></p> <p>¶ 60: In 1998, al Aqsa Islamic Bank was established with \$20 million in capital. The main shareholders were Dallah al Baraka Group LLC and the Jordan Islamic Bank. Jordan Islamic Bank, a Dallah al-Baraka LLC subsidiary, owns 14 percent of al-Aqsa Islamic Bank. Saleh Abdullah Kamel acknowledged that Dallah al-Baraka Group LLC owns another twelve percent directly.</p>
<p><i>O'Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>Allegation does not appear.</p>
<p><i>Cantor Fitzgerald</i></p> <p>Allegation does not appear.</p>	<p><i>Continental Casualty</i></p> <p>¶ 487: In 1998, AL AQSA ISLAMIC BANK was established with \$20 million in capital. The main shareholders were Dallah AL BARAKA Group LLC and the Jordan Islamic Bank. Jordan Islamic Bank, a Dallah al-Baraka LLC subsidiary, owns 14 percent of AL-AQSA ISLAMIC BANK. SALEH ABDULLAH KAMEL acknowledged that Dallah AL-BARAKA Group LLC owns another twelve percent directly.</p>
<p><i>NY MAGIC</i></p> <p>¶ 283: ...Al Baraka has provided substantial support to al Qaida through its subsidiaries and affiliates, including ... al-Aqsa Bank...</p>	<p><i>WTC Properties</i></p> <p>¶ 108: In 1998, Al Aqsa Islamic Bank was established with \$20 million in capital. The main shareholders were Dallah al Baraka Group LLC and the Jordan Islamic Bank. Jordan Islamic Bank, a Dallah al-Baraka LLC subsidiary, owns 14 percent of al-Aqsa Islamic Bank. Saleh Abdullah Kamel acknowledged that Dallah al-Baraka Group LLC owns another twelve percent directly.</p>

Misc. Banking Assets and Relations

<p><i>Ashton</i></p> <p>¶ 599: Al Baraka Turkish Finance House, an AL BARAKA branch in Turkey, is a subsidiary of DALLAH AL BARAKA Group LLC.</p>	<p><i>Burnett</i></p> <p>¶ 63: Al Baraka Turkish Finance House, an al Baraka branch in Turkey, is a subsidiary of Dallah al Baraka Group LLC.</p> <p>¶ 111: The Dubai Islamic Bank is a shareholder of Baraka Islamic Bank EC, an affiliate of Defendant Al Baraka Bank.</p> <p>¶ 143: The Saudi American Bank is the official correspondent of the al Baraka Bank Lebanon... The Saudi American Bank has maintained a partnership with al Baraka financial system...</p> <p>¶ 144: The Saudi American Bank serves as the bank for the Dallah al Baraka Group...</p>
<p><i>O'Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>Allegation does not appear.</p>
<p><i>Cantor Fitzgerald</i></p> <p>Allegation does not appear.</p>	<p><i>Continental Casualty</i></p> <p>¶ 490: Al Baraka Turkish Finance House, an AL BARAKA branch in Turkey, is a subsidiary of DALLAH AL BARAKA Group LLC.</p> <p>¶ 524: The SAUDI AMERICAN BANK is the official correspondent of the al Baraka Bank Lebanon, based in Beirut... The SAUDI AMERICAN BANK has maintained a partnership with al Baraka financial system since its beginning.</p> <p>¶ 525: The SAUDI AMERICAN BANK serves as the bank for the Dallah AL BARAKA Group.</p>
<p><i>NY MAGIC</i></p> <p>¶ 283: In addition, Al Baraka has provided substantial support to al Qaida through its subsidiaries and affiliates, including Al Shamal Islamic Bank, Tadamon Islamic Bank and Al-Aqsa Bank, as further described herein.</p> <p>¶ 322: Dubai Islamic Bank is a financial institution ... which holds significant equitable interests in ... entities associated with al Baraka Bank.</p> <p>¶ 327: Dubai Islamic Bank has further sponsored al Qaida through its interest in ... various al Baraka entities.</p>	<p><i>WTC Properties</i></p> <p>¶ 110: Al Baraka Turkish Finance House, an al Baraka branch in Turkey, is a subsidiary of Dallah al Baraka Group LLC.</p> <p>¶ 280: The Saudi American Bank is the official correspondent of the al Baraka Bank Lebanon... The Saudi American Bank has maintained a partnership with al Baraka financial system...</p> <p>¶ 282: The Saudi American Bank serves as the bank for the Dallah al Baraka Group...</p>

Ownership Interest in Dallah Avco

<p><i>Ashton</i></p> <p>¶ 589: DALLAH ALBARAKA GROUP LLC's portfolio includes a wholly owned subsidiary specializing in aviation services, DALLAH AVCO TRANS-ARABIA CO LTD. The company was formed in 1975 and is based in Jedah, Saudi Arabia.</p>	<p><i>Burnett</i></p> <p>¶ 53: Dallah Albaraka Group LLC's portfolio includes a wholly owned subsidiary specializing in aviation-services, Dallah Avco Trans-Arabia Co Ltd. The company was formed in 1975 and is based in Jeddah, Saudi Arabia.</p>
<p><i>O'Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>¶ 86: ...Dallah Avco Trans-Arabia Co., Ltd. [is] a subsidiary of Dallah Albaraka...</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 100: ...Dallah Avco Trans-Arabia Co., Ltd. [is] a subsidiary of Dallah Albaraka...</p>	<p><i>Continental Casualty</i></p> <p>¶ 480: Dallah Albaraka Group LLC's portfolio includes a wholly owned subsidiary specializing in aviation-services, Dallah Avco Trans-Arabia Co Ltd. The company was formed in 1975 and is based in Jeddah, Saudi Arabia.</p>
<p><i>NY MAGIC</i></p> <p>¶ 387: ...Dallah Avco Trans Arabia Co. Ltd. ("Dallah Avco"), [is] a division of the Dallah al-Baraka business group...</p>	<p><i>WTC Properties</i></p> <p>¶ 101: Dallah Albaraka Group LLC's portfolio includes a wholly owned subsidiary specializing in aviation-services, Dallah Avco Trans-Arabia Co. Ltd. The company was formed in 1975 and is based in Jeddah, Saudi Arabia.</p>

Employment of Omar al Bayoumi by Dallah Avco

<p><i>Ashton</i></p> <p>¶ 590: OMAR AL BAYOUMI, a Saudi national, was Assistant to the Director of Finance for an AL BARAK company, DALLAH AVCO, a position he gave as a reference in an application for admission to Case Western Reserve University in Cleveland, Ohio in 1998.</p>	<p><i>Burnett</i></p> <p>¶ 55: Omar al Bayoumi was Assistant to the Director of Finance for an al Baraka company, Dallah Avco, a position he gave as a reference in an application for admission to Case Western Reserve University in Cleveland, Ohio in 1998.</p>
<p><i>O'Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>¶ 86: .. Dallah Avco Trans-Arabia Co., Ltd. .. employed Omar al Bayoumi, who paid for the housing costs of two September 11th attackers.</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 100: ...Dallah Avco Trans-Arabia Co., Ltd. . . . employed Omar al Bayoumi ...</p>	<p><i>Continental Casualty</i></p> <p>¶ 481: OMAR AL BAYOUMI, a Saudi national, was Assistant to the Director of Finance for an AL BARAKA company, Dallah Avco, a position he gave as a reference in an application for admission to Case Western Reserve University in Cleveland, Ohio in 1998.</p>
<p><i>NY MAGIC</i></p> <p>¶ 387: ... In or around 1994, Al-Bayoumi was hired by Dallah Avco Trans-Arabia Co. Ltd. ("Dallah Avco"), a division of the Dallah al-Baraka business group, to work on an aviation project commissioned by the Saudi government.</p> <p>¶ 388: Al-Bayoumi remained in the employment of Dallah Avco for the next seven years...</p>	<p><i>WTC Properties</i></p> <p>¶ 103: Omar al Bayoumi was Assistant to the Director of Finance for an al Baraka company, Dallah Avco, a position he gave as a reference in an application for admission to Case Western Reserve University in Cleveland, Ohio in 1998.</p>

Misc. Business Assets and Relations

<p><i>Ashton</i></p> <p>¶ 507: Defendant DALLAH AL BARAKA (Chaired by Defendant SALEH ABDULLAH KEMAL) [is a shareholder] of the National Environmental Preservation Co Ltd in Jubail, Saudi Arabia.</p>	<p><i>Burnett</i></p> <p>¶ 413: Defendant DALLAH AL BARAKA [is a shareholder] of the National Environmental Preservation Co Ltd in Jubail, Saudi Arabia.</p> <p>¶ 414: Defendant Saleh Abdullah Kamel.. created in 1991 the leading Arab television satellite service, Middle East Broadcasting Corp (or “MBC”), which purchased the press agency United Press International (or “UPI”) in 1992.</p>
<p><i>O’Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>Allegation does not appear.</p>
<p><i>Cantor Fitzgerald</i></p> <p>Allegation does not appear.</p>	<p><i>Continental Casualty</i></p> <p>¶ 311: Defendant DALLAH AL BARAKA [is a shareholder] of the National Environmental Preservation Co Ltd in Jubail, Saudi Arabia.</p> <p>¶ 312: Defendant SALEH ABDULLAH KAMEL.. created the leading Arab television satellite service, Middle East Broadcasting Corp (or "MBC"), which purchased the press agency United Press International (or “UPI”) in 1992.</p>
<p><i>NY MAGIC</i></p> <p>Allegation does not appear.</p>	<p><i>WTC Properties</i></p> <p>¶ 654: [Al Baraka] is a member of the U.S.-Saudi Arabian Business Council (“USSABC”)...</p> <p>¶ 413: Defendant Dallah al Baraka [is a shareholder] of the National Environmental Preservation Co Ltd in Jubail, Saudi Arabia.</p> <p>¶ 750: Defendant Saleh Abdullah Kamel.. created in 1991 the leading Arab television satellite service, Middle East Broadcasting Corp (or “MBC”), which purchased the press agency United Press International (or “UPI”) in 1992.</p>

General Provision of Banking Services to Al Haramain

<p><i>Ashton</i></p> <p>¶ 585: ...[t]he use of AL BARAKA Bank by AL-HARAMAIN was confirmed by a statement from AL-HARAMAIN chairman, AQUEEL AL AQUEEL, who declared that the charity maintained accounts at AL BARAKA Bank in Saudi Arabia.</p>	<p><i>Burnett</i></p> <p>¶ 49: ...[t]he use of AL BARAKA Bank by AL-HARAMAIN was confirmed by a statement from AL-HARAMAIN chairman, AQUEEL AL AQUEEL, who declared that the charity maintained accounts at AL BARAKA Bank in Saudi Arabia.</p>
<p><i>O'Neill</i></p> <p>¶ 30: Defendants al Baraka and Dallah Albaraka have played direct roles in funding al Qaida (sic), in part, through Defendant al-Haramain, and another terrorist organization, HAMAS.</p>	<p><i>Euro Brokers</i></p> <p>¶ 90: Al Baraka maintained and serviced bank accounts held by defendant Al-Haramain whose funds were earmarked for and transferred to Al Qaeda.</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 104: For instance, Al Baraka maintained and services bank accounts held by defendant Al-Haramain whose funds were earmarked for and transferred to Al Qaeda.</p>	<p><i>Continental Casualty</i></p> <p>¶ 476 : ... [t]he use of AL BARAKA Bank by AL-ARAMAIN was confirmed by a statement from AL-HARAMAIN chairman, AQUEEL AL AQUEEL, who declared that the charity maintained accounts at AL BARAKA Bank in Saudi Arabia.</p>
<p><i>NY MAGIC</i></p> <p>¶ 278: Al Baraka has knowingly maintained accounts for many of the charity defendants that operate within al Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF and Al Haramain, among others.</p>	<p><i>WTC Properties</i></p> <p>¶ 97: ... [t]he use of AL BARAKA Bank by AL-ARAMAIN was confirmed by a statement from AL-HARAMAIN chairman, AQUEEL AL AQUEEL, who declared that the charity maintained accounts at AL BARAKA Bank in Saudi Arabia.</p>

Bosnian Reports re: Provision of Banking Services to Al Haramain

<p><i>Ashton</i></p> <p>¶ 598: AL BARAKA provided support to the “charity” AL-HARAMAIN operations and helped transfer funds for OSAMA BIN LADEN, as reported by the Bosnian Intelligence Agency...in a memorandum titled “Some illegal activities of humanitarian organization.”:</p> <p><i>Records available for 1998 show a flow of money into the so-called “operating” account of the HO [Humanitarian Organization] at the Deposit Bank, Sarajevo, from the “main” account, sent from Saudi Arabia via the Deutsche Bank and the Albaraka Bank in Turkey. The amount is 1,059,687 DEM [\$2.13 million]. (See also ¶ 600)</i></p>	<p><i>Burnett</i></p> <p>¶ 62: AL BARAKA provided support to the “charity” AL-HARAMAIN operations and helped transfer funds for OSAMA BIN LADEN, as reported by the Bosnian Intelligence Agency...in a memorandum titled “Some illegal activities of humanitarian organization.”:</p> <p><i>Records available for 1998 show a flow of money into the so-called “operating” account of the HO [Humanitarian Organization] at the Deposit Bank, Sarajevo, from the “main” account, sent from Saudi Arabia via the Deutsche Bank and the Albaraka Bank in Turkey. The amount is 1,059,687 DEM [\$2.13 million].</i></p>
<p><i>O’Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>Allegation does not appear.</p>
<p><i>Cantor Fitzgerald</i></p> <p>Allegation does not appear.</p>	<p><i>Continental Casualty</i></p> <p>¶ 489: AL BARAKA provided support to the “charity” AL-HARAMAIN operations and helped transfer funds for OSAMA BIN LADEN, as reported by the Bosnian Intelligence Agency...in a memorandum titled “Some illegal activities of humanitarian organization.”:</p> <p><i>Records available for 1998 show a flow of money into the so-called “operating” account of the HO [Humanitarian Organization] at the Deposit Bank, Sarajevo, from the “main” account, sent from Saudi Arabia via the Deutsche Bank and the Albaraka Bank in Turkey. The amount is 1,059,687 DEM [\$2.13 million].</i></p>
<p><i>NY MAGIC</i></p> <p>¶ 280: The accounts maintained by Al Baraka on behalf of the charities operating within al Qaida’s infrastructure, and in particular accounts it maintained for al-Haramain, have been used to transfer funds to al Qaida cells throughout the world. Accounts maintained by Al Baraka on behalf of al-Haramain have served as a principal vehicle for funding al Qaida’s operations in Bosnia, according to Bosnian officials.</p>	<p><i>WTC Properties</i></p> <p>¶ 109: AL BARAKA provided support to the “charity” AL-HARAMAIN operations and helped transfer funds for OSAMA BIN LADEN, as reported by the Bosnian Intelligence Agency...in a memorandum titled “Some illegal activities of humanitarian organization..”:</p> <p><i>Records available for 1998 show a flow of money into the so-called “operating” account of the HO [Humanitarian Organization] at the Deposit Bank, Sarajevo, from the “main” account, sent from Saudi Arabia via the Deutsche Bank and the Albaraka Bank in Turkey. The amount is 1,059,687 DEM [\$2.13 million].</i></p>

Russian Intelligence Memo re: Provision of Banking Services to Al Harmain

<p><i>Ashton</i></p> <p>¶ 584: A memo from the Russia Federations' Security Service details the Al BARAKA Bank's role in funding Defendant AL-HARAMAIN: On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal accounts of field commanders, including Khattab and Basayef.</p>	<p><i>Burnett</i></p> <p>¶ 48: A memo from the Russia Federation's Security Service details the al Baraka Bank's role in funding Defendant al-Haramain: On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal foreign accounts of field commanders, including Khattab and Basayef.</p>
<p><i>O'Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>Allegation does not appear.</p>
<p><i>Cantor Fitzgerald</i></p> <p>Allegation does not appear.</p>	<p><i>Continental Casualty</i></p> <p>¶ 475: A memo from the Russia Federation's Security Service details the AL BARAKA Bank's role in funding Defendant AL-HARAMAIN: On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal foreign accounts of field commanders, including Khattab and Basayef.</p>
<p><i>NY MAGIC</i></p> <p>Allegation does not appear.</p>	<p><i>WTC Properties</i></p> <p>¶ 96: A memo from the Russian Federation's Security Service details the al Baraka Bank's role in funding Defendant al-Haramain: On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal foreign accounts of field commanders, including Khattab and Basayef.</p>

Founding of Sana-Bell Inc./Relation with IIRO

<p><i>Ashton</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO</p>	<p><i>Burnett</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO</p>
<p><i>O'Neill</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO.</p>	<p><i>Euro Brokers</i></p> <p>¶ 47: Sana-Bell was [co-]founded by defendants Saleh Abdullah Kamel...</p> <p>¶ 50: IIRO defendants include.. Saleh Abdullah Kamel [who] lent material support to Al Qaeda and OBL, aided and abetted others who lent material support to Al Qaeda and OBL, and otherwise engaged in racketeering activity in violation of the law.</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 60: Sana-Bell was founded by defendants Saleh Abdullah Kamel and Ibrahim Afandi.</p> <p>¶ 63. IIRO defendants include.. Saleh Abdullah Kamel ... These defendants lent material support to Al Qaeda and OBL, aided and abetted others who lent material</p>	<p><i>Continental Casualty</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO.</p>
<p><i>NY MAGIC</i></p> <p>¶ 450: Ibrahim Mohammed Afandi ("Afandi") co-founded Sana-Bell, Inc.'s Washington, DC branch along with defendant Saleh Kamel.</p> <p>¶ 465: ... Saleh Kamel also co-founded the U.S. branch of Sana-Bell, Inc., an enterprise established to provide revenues to sustain the U.S. operations of the IIRO. In founding Sana-Bell, Inc., Saleh Kamel knew and intended that it would be used as a vehicle for funding terrorist organizations, including al Qaida, through IIRO and the SAAR Network...</p>	<p><i>WTC Properties</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO.</p>

Misc. Relations with and Contributions to Charities

<p><i>Ashton</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO</p>	<p><i>Burnett</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO</p>
<p><i>O'Neill</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO.</p>	<p><i>Euro Brokers</i></p> <p>¶ 47: Sana-Bell was founded by defendants Saleh Abdullah Kamel and Ibrahim Afandi.</p> <p>¶ 50: IIRO defendants include.. Saleh Abdullah Kamel ... These defendants lent material support to Al Qaeda and OBL, aided and abetted others who lent material support to Al Qaeda and OBL, and otherwise engaged in racketeering activity in violation of the law.</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 60: Sana-Bell was founded by defendants Saleh Abdullah Kamel and Ibrahim Afandi.</p> <p>¶ 63. IIRO defendants include.. Saleh Abdullah Kamel ... These defendants lent material support to Al Qaeda and OBL, aided and abetted others who lent material.</p>	<p><i>Continental Casualty</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO.</p>
<p><i>NY MAGIC</i></p> <p>¶ 279: ...Al Baraka advertises the existence and numerical designations of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida's supporters to deposit funds directly into those accounts...</p> <p>¶ 281: Al Baraka has long known that the accounts it maintained for many ostensible charities were being used to solicit and transfer funds to terrorist organizations, including al Qaida.</p> <p>¶ 282: Despite this knowledge, Al Baraka has continued to maintain those accounts. In doing so, Al Baraka knowingly provided financial services and other forms of material support to al Qaida.</p> <p>See also: ¶¶ 465 -66</p>	<p><i>WTC Properties</i></p> <p>No allegations relating to Mr. Kamel's charitable work with Sana-Bell or IIRO.</p>

The “Golden Chain”

<p><i>Ashton</i></p> <p>Allegation does not appear, but argued in motions.</p>	<p><i>Burnett</i></p> <p>Allegation does not appear</p>
<p><i>O'Neill</i></p> <p>Allegation does not appear.</p>	<p><i>Euro Brokers</i></p> <p>¶ 48: Defendant Saleh Abdullah Kamel... appear[s] on a list of wealthy Al Qaeda donors referred to by Al Qaeda as the “Golden Chain”. Golden Chain financiers donated funds earmarked for OBL directly and also through charities... As noted by the recent report of the 9/11 Commission, Al Qaeda’s “Golden Chain” financial support network was organized “mainly by financiers in Saudi Arabia” and other Persian Gulf states and “[d]onations flowed through charities and other nongovernmental organizations” to OBL.</p> <p>See also ¶ 87</p>
<p><i>Cantor Fitzgerald</i></p> <p>¶ 61: Defendant Saleh Abdullah Kamel... appear[s] on a list of wealthy Al Qaeda donors referred to by Al Qaeda as the “Golden Chain”. Golden Chain financiers donated funds earmarked for OBL directly and also through charities... As noted by the recent report of the 9/11 Commission, Al Qaeda’s “Golden Chain” financial support network was organized “mainly by financiers in Saudi Arabia” and other Persian Gulf states and “[d]onations flowed through charities and other nongovernmental organizations” to OBL.</p> <p>See also ¶ 101</p>	<p><i>Continental Casualty</i></p> <p>Allegation does not appear</p>
<p><i>NY MAGIC</i></p> <p>¶ 80: Within the Tareekh Osama file, investigators also uncovered a document called the “Golden Chain.” According to officials of the U.S. government, this document is “a list of people referred to within al Qaida” as wealthy donors to the al Qaida movement. Among the individuals identified in the Golden Chain as al Qaida’s principal sponsors [is] defendant[] Saleh Abdullah Kamel...</p> <p>¶ 465: ... [Saleh Abdullah] Kamel is identified on the Golden Chain as one of al Qaida’s principal financiers ...</p>	<p><i>WTC Properties</i></p> <p>¶ 150: Early in the formation of al Qaeda, at a time when its objective was global Jihad, warfare and bloodshed envisaging terrorist attacks against "Western" targets, Osama bin Laden received financial support from a group of wealthy donors from the Gulf areas known as the Golden Chain. The list of donors includes Defendant[].. Saleh Kamel...</p>